

August 18, 2016

VIA ELECTRONIC SUBMISSION

Vikki Wachino  
Director, Centers for Medicaid and CHIP Services  
Centers for Medicare and Medicaid Services  
7500 Security Boulevard  
Baltimore, MD 21244-1850

**Re: Iowa Family Planning Network Section 1115 Demonstration Waiver**

Dear Ms. Wachino:

Planned Parenthood of the Heartland (“Planned Parenthood”) is pleased to submit these comments on the Iowa Family Planning Network Section 1115 Demonstration Waiver (IFPN). As a trusted women’s health care provider and advocate, Planned Parenthood supports the commitment of the Centers for Medicare and Medicaid Services (CMS) to seeking input on this proposal from a cross section of stakeholders.

As one of the hundreds of providers serving patients through the IFPN program, Planned Parenthood of the Heartland sees firsthand how the services covered by this waiver benefit Iowans. Since 2006 when the program began, the IFPN has provided tens of thousands of women and men with much-needed family planning services. In 2015, more than 30,000 Iowans were enrolled in this program and had access to services such as exams, birth control methods, pregnancy testing, and STD testing and treatment. Even with changes to the health care landscape and greater access to health insurance coverage, the IFPN continues to be an essential program to ensure access to these services. It provides a safety net for individuals who do not qualify for other assistance or who are unable to access other coverage.

We are pleased that the state of Iowa is seeking to extend IFPN. However, it is concerning the state is seeking to extend the program only for three years, particularly given the program’s previous success. Family planning is incredibly important for many individuals across the state. In fact, it is well established that family planning improves women’s health by preventing unintended pregnancies, promoting healthy birth spacing, reducing health disparities and lowering maternal morbidity.<sup>1</sup> In recognizing that IFPN complements the state’s health care system and improves critical health outcomes for women and their families, we request that CMS approve the proposal for the maximum period of time permitted, an additional five years, as CMS has been done in the past. Extending the program for five years, instead of three, helps

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<sup>1</sup> Guttmacher Institute. “State Facts on Publicly Funded Family Planning Services.” (July 2015). <https://www.guttmacher.org/fact-sheet/state-facts-publicly-funded-family-planning-services>

ensure that low-income and underinsured individuals will be able to receive critical family planning care for an extended period of time and without delay.

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We look forward to working with CMS in our shared goal to improve access to quality health care, and we thank you for the opportunity to provide these comments. If you have any questions, please do not hesitate to contact me at 515-235-0443 or [Erin.Davison-Rippey@ppheartland.org](mailto:Erin.Davison-Rippey@ppheartland.org)

Sincerely,

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